

Christina N. Goodrich (SBN 261722)
christina.goodrich@klgates.com
Cassidy T. Young (SBN 342891)
cassidy.young@klgates.com
K&L Gates LLP
10100 Santa Monica Boulevard
Eighth Floor
Los Angeles, California 90067
Telephone: +1 310 552 5000
Facsimile: +1 310 552 5001

[Additional counsel on signature page]

**Attorneys for Plaintiff Entropic
Communications, LLC**

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS,
LLC,

Plaintiff,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No.: 2:23-cv-01049-JWH-KES
(Lead Case)

Case No.: 2:23-cv-01050-JWH-KES
(Related Case)

[Assigned to the Honorable John W.
Holcomb]

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

COMCAST CORPORATION, *et al.*,

Defendants.

**PLAINTIFF ENTROPIC
COMMUNICATIONS, LLC'S
NOTICE OF ERRATA RE
SECOND AMENDED
COMPLAINT (DKT. 128)**

NOTICE OF ERRATA

1 **TO THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF**
 2 **RECORD:**

3 **PLEASE TAKE NOTICE** that Entropic Communications, LLC's
 4 ("Entropic") hereby provides this notice of errata to correct two inadvertent errors in
 5 its Second Amended Complaint ("SAC") (Dkt. 128).

6 First, the SAC inadvertently included the proposed new allegations relating to
 7 a pending motion for leave to amend or supplement, which sought to add new claims
 8 based on additional patents. Specifically, Entropic's SAC inadvertently included
 9 allegations regarding U.S. Patent No. 9,866,438 (the "'438 Patent") and U.S. Patent
 10 No. 11,785,275 (the "'275 Patent"), about which Entropic separately sought leave to
 11 amend and supplement its First Amended Complaint to include. (*See* Dkt. 114 and
 12 115, Entropic's Motions for Leave to Amend and Supplement its complaints against
 13 Cox Communications, Inc., *et al.* and Comcast Corporation, *et al.* respectively).
 14 Those allegations remain the subject of a pending motion for leave to amend and
 15 supplement, which is being concurrently amended to make clear that it was not
 16 mooted by the filing of the SAC.

17 Second, the SAC erroneously referred to willful infringement, instead of
 18 willful misappropriation when referring to Comcast's misappropriation of
 19 MaxLinear's trade secrets.

20 Filed concurrently herewith is the Corrected version of Entropic's SAC that 1)
 21 excludes all allegations related to the '438 Patent and '275 Patent and 2) corrects
 22 certain allegations of "willful infringement" of trade secrets by replacing those
 23 references with misappropriation of trade secrets at Paragraph 115 and deleting
 24 Paragraph 116 entirely. Paragraph 115 has additionally been modified to further
 25 clarify the allegations of trade secret misappropriation made therein. The Correct
 26 SAC is otherwise identical to Dkt. 128 in all material respects. The Corrected SAC
 27 contains the very same redactions approved by the Court's Order granting Entropic's
 28 application to file its SAC under seal (Dkt. 134), but Entropic separately and

1 concurrently will file an Application to file under seal an un-redacted copy of the
2 SAC, which it will likewise promptly serve upon counsel of record for Defendants.

3
4 Dated: December 15, 2023

Respectfully submitted,

5 By: /s/ Christina Goodrich
6 Christina Goodrich (SBN 261722)
7 christina.goodrich@klgates.com
8 Cassidy T. Young (SBN 342891)
9 cassidy.young@klgates.com
10 **K&L GATES LLP**
11 10100 Santa Monica Boulevard
12 Eighth Floor
13 Los Angeles, CA 90067
14 Telephone: +1 310 552 5000
15 Facsimile: +1 310 552 5001

16 James Shimota (*pro hac vice*)
17 Jason Engel (*pro hac vice*)
18 **K&L GATES LLP**
19 70 W. Madison Street, Suite 3300
20 Chicago, IL 60602
21 Tel.: (312) 372-1121
22 Fax: (312) 827-8000
23 jim.shimota@klgates.com
24 jason.engel@klgates.com
25 *Attorneys for Plaintiff Entropic*
26 *Communications, LLC*
27
28